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Second comment period: May 1 - June 30, 2019

SFI STANDARDS REVISION - SECOND COMMENT PERIOD

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SFI STANDARD REVISION COMMENT TEMPLATE FOR SFI STANDARDS AND RULES

	SFI 2022 Standards & Rules Section (April XX Version)	Clause (e.g. Indicator 1.a)	Comment	Proposed new language
1	Section 14: Definitions	certified content	This definition represents an important and substantial flaw in this standard. As defined, it is identical to Certified Forest Content. This renders most common applications of claims invalid - clearly not the intent.	Define Certified Content to include all categories that are used as the basis for claims - including Cert. Forest Content, Certified Sourcing, Recycled.
2	Section 14: Definitions	certified sourcing	This long-standing definition contains an unfortunate flaw that should (finally) be fixed. As stated, CS includes a) Section 3 certified material, b) Recycled (pre- & post-), c) CFC, and d) non-controversial sources. This is contrary to the 2/3 threshold found in Section 5. It also implies that Certified Sourcing material is the same as both Recycled and CFC - clearly not the case. Overall, this definition is confusing (at best) and misleading (at worst).	Limit the definition to material produced by Section 3 certificates.